

KELLEY DRYE & WARREN LLP

Lauri A. Mazzuchetti (*pro hac vice*)

Glenn T. Graham (SBN 338995)

7 Giralda Farms, Suite 340

Madison, New Jersey 07940

Telephone: (973) 503-5900

Facsimile: (973) 503-5950

lmazzuchetti@kelleydrye.com

ggraham@kelleydrye.com

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

PEGGY BANKS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SUNRUN INC.

Defendant.

Case No.

4:24-cv-07877-JST

**JOINT STIPULATION AND
~~PROPOSED ORDER TO AMEND~~
SCHEDULING ORDER**

Plaintiff Peggy Banks (“Plaintiff”) and Defendant Sunrun Inc. (“Sunrun”) (collectively, “the Parties”) by and through their undersigned counsel of record and subject to the Court’s approval, submit this Stipulation and Proposed Order. Pursuant to the Court’s approval, Parties stipulate as follows:

WHEREAS, Plaintiff filed the Complaint on November 11, 2024;

WHEREAS, Sunrun moved to strike parts of the Complaint on January 27, 2025, which the Court denied on May 5, 2025;

WHEREAS, Sunrun answered the First Amended Complaint on May 19, 2025;

WHEREAS, this Court held an initial case management conference on May 6, 2025;

WHEREAS, the Parties are currently actively engaged in discovery;

WHEREAS, the Parties are also currently actively engaged in resolving deficiencies to such discovery responses between themselves and without need for judicial intervention;

WHEREAS, the Parties are continuing to meet and confer with respect to potential discovery disputes;

WHEREAS, the Parties agree that efficiency dictates the proposed deadlines in the above-captioned matter to afford the Parties additional time to continue necessary discovery;

WHEREAS, subject to Court approval, Parties stipulate to the below revised schedule:

Event	Current Deadline	Proposed Deadline
Expert Disclosures	November 19, 2025	January 16, 2026
Expert Rebuttal	December 22, 2025	February 20, 2026
Discovery cut-off	January 15, 2026	April 14, 2026
Deadline to conduct private mediation	January 19, 2026	April 28, 2026
Last day to file dispositive motions	April 2, 2026	June 1, 2026
Last day to file oppositions to dispositive motions	April 30, 2026	June 29, 2026
Last day to file replies to dispositive motions	June 4, 2026	August 3, 2026
Dispositive motion hearing	June 25, 2026	August 27, 2026
Last day to file motion for class certification	July 30, 2026	September 28, 2026
Last day to file opposition to class certification	September 3, 2026	November 2, 2026
Last day to file reply in further support of class certification	October 1, 2026	November 30, 2026

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 Dated: November 14, 2025

2
3 /s/ Andrew R. Perrong

4 Andrew R. Perrong (*pro hac vice*)
5 **Perrong Law LLC**
6 2657 Mount Carmel Avenue
7 Glenside, PA 19038
8 Telephone: (215) 225-5529 (CALL-LAW)
9 Facsimile: (888) 329-0305
10 a@perronglaw.com

11 Dana J. Oliver (SBN #291082)
12 **Oliver Law Center, Inc.**
13 8780 19th Street, #559
14 Rancho Cucamonga, CA 91701
15 Tel: (855) 384-3262
16 Facsimile: (888) 570-2021

17 *Counsel for Plaintiff Peggy Banks*

/s/ Glenn T. Graham

Lauri A. Mazzuchetti (*pro hac vice*)
Glenn T. Graham (SBN #338995)
Kelley Drye & Warren LLP
7 Giralda Farms, Suite 340
Madison, New Jersey 07940
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
lmazzuchetti@kelleydrye.com
ggraham@kelleydyre.com

Counsel for Defendant, Sunrun Inc.

18 **ATTESTATION OF FILER**

19 Pursuant to Civil L.R. 5-1(i)(3), the undersigned filer hereby attests that all signatories
20 listed, and on whose behalf the filing is submitted, concur in the filing's content and have
21 authorized the filing.

22 Dated: November 14, 2025

/s/ Glenn T. Graham

Glenn T. Graham

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

24 Dated: November 18, 2025


Hon. Jon S. Tigar, USDJ